



From: [Moore, Gary](#)
To: [Werner, Robert](#)
Cc: [Moran, Gloria](#); [Mueller, Brian](#); [Johnson, Lydia](#); [Webster, Susan](#); [Petersen, Chris](#)
Subject: Falcon: Attorney Client/ Enforcement Sensitive
Date: Saturday, January 17, 2015 10:14:51 AM

Hello All

Although I would like us to issue a default notice on the removal action, I am not sure this would move the site forward. I may be able to do \$ 2 million plus the \$ 500,000 worth of work if we actually have the money. Since it is an NPL site, Carl has up to \$ 6 mill on Removal Actions if headquarters has not pulled the regions authority to authorize due to budget issues.

The cost to LTR1 will be \$3 mill due to our 50% overhead. We may already be racking up costs that they will never be able to overcome.

Anyway, I am not sure where we need to go. There are a lot of complicating factors to consider.

A release from the tanks would:

1. Theoretically remain in secondary containment although to soil seems to be very sandy with high water table;
2. If material goes offsite it will go to wetlands and into Redfish Bay but will likely be caught since they have people on site,
3. The risk to human health could be odors or if the material goes off site primarily contact;
4. Since the material is oily, the would likely be impact to wildlife.

Thanks
Gary

Sent from my iPhone

On Jan 16, 2015, at 2:54 PM, Werner, Robert <Werner.Robert@epa.gov> wrote:

CORRECTION – Tuesday's meeting is only a **pre-briefing** for Carl/Pam

From: Werner, Robert
Sent: Friday, January 16, 2015 2:41 PM
To: Moran, Gloria; Moore, Gary; Mueller, Brian
Cc: Johnson, Lydia
Subject: Falcon Refinery (06MC)2012-03-16 - Power point presentation for Car//Pam

Gloria, Gary, Brian:



9596457

Site briefing with Carl/Pam is set for next Tuesday at 2:00 pm

Can we meet/conference call at 10:00 am before the afternoon meeting with Carl/Pam to cover what the "team" will say at this meeting?

Bob

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<Power Point, Falcon Refinery, 2015-01-20).pptx>